

Administrative Records and Record Linkage: Policy and Data Dissemination

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The Census Bureau's Mission is to...

- Serve as the leading source of quality data about the nation's people and economy;
- Honor privacy, protect confidentiality;
- Share our expertise globally, and conduct our work openly....

Title 13 Says the Census Bureau May not...

- Use information furnished under provisions of this title for any purpose other than statistical purposes for which it is supplied; or
- Make any publication whereby the data furnished by any particular establishment or individual under this title can be identified

Data Stewardship at the Census Bureau

- Management commitment
- Formal structure
- Built on foundation of values and principles—
management decisions recognize ethical
considerations
- Controls applied through implementation of
Privacy Impact Assessments
- New policies respond to changing
environment

Data Stewardship

Making Special Commitments To ...

- Our **DATA PROVIDERS** – a commitment to manage and safeguard data in accordance with their legal authorities and policy requirements, and to use the data only as specified in our agreements.
- The **DATA USER COMMUNITY** – a commitment that access to administrative records will result in relevant high-quality products.
- The **PUBLIC** – a commitment to maintain the confidentiality of their personal information and to ensure that the information will be used solely for statistical purposes.

Legal Guidance and Protections

Census authority and legal protections for using administrative records comes from:

- Title 13, U.S.C., Sections 6 and 9
- Title 26, U.S.C., Section 6103(j)
- Privacy Act of 1974
- Paperwork Reduction Act

Confidentiality: pertains to the treatment of information that an individual has disclosed in a relationship of trust and with the expectation that it will not be divulged to others in ways that are inconsistent with the understanding of the original disclosure without permission. (IRB Guidebook, Part III.D, DHHS, OHRP)

Requirements for maintaining the confidentiality of all respondent information is set forth in:

- Title 13, U.S.C., Sections 9 and 214
- Government Information Security Reform Act
- Federal Information Security Management Act of 2002
- Federal Information Processing Standard—Standards for Security Categorization of Federal Information and Information Systems (FIPS-199)

Information Privacy is the claim of individuals, groups, or institutions to determine for themselves when, how, and to what extent information about themselves is communicated to others. (Alan Westin, 1967)

Requirements for ensuring the privacy of individuals come from:

- Title 13, United States Code
- Privacy Act of 1974
- The Freedom of Information Act
- Health Insurance Portability and Accountability Act of 1996
- E-Government Act of 2002

Census Bureau Policies



Mission
Necessity

Confidentiality

Openness

Respect

1. Reimbursable Project Acceptance Criteria
2. Title 13 Benefits
3. Linkage of Decennial Census
4. Appropriated Project Design Criteria*
5. Record Linkage

1. Informed Consent Criteria*

1. Respectful Treatment of Respondents*

1. Controlling Non-employee Access to Title 13 Data
2. Title 13 Training
3. Unauthorized Browsing
4. Data Classification and Handling*
5. Access to Personally Identified Data*
6. Controlling Access to Identified Data (C2)

Policies Under Multiple Principles

1. Respondent Identification
2. Collaborative Arrangement w/Agencies
3. Admin. Records Policies and Procedures
4. Policy Statement on Religion

Policy Statement on Record Linkage

Establishes six principles for conducting Census Bureau projects that use record linkage techniques:

- Mission Necessity
- Best Alternative
- Public Good Determination
- Sensitivity
- Openness
- Consistent Review and Tracking

Controls that Support the Statistical Use of Administrative Records

- Centralized data acquisition and agreements
- Centralized project review
- Need-to-know access
- Removal of identifiable information
- Administrative Records Tracking System
- File receipt logs and audit trails
- Independent site reviews
- Security and confidentiality training
 - Title 13
 - Title 26
 - IT Security

Unique Privacy and Confidentiality Concerns

- Is consent needed for the statistical use of administrative records?
 - Through the data provider?
 - Through the survey collector?
 - Conditions? Opt-in/opt-out? Mandatory/voluntary?
- Will the public accept a near real-time system to respond to immediate statistical needs?
- Does the public trust the protections around inter-agency data sharing?
- How can we be more transparent about record linkage activities?
- How can we continue to meet statistical needs while assuring confidentiality?

Statistical Access Alternatives Being Examined

- Delivering PUMS files where possible
- Assessing opportunities for enhancing/streamlining RDCs
- Researching assisted electronic access—
Luxembourg Method
- Researching synthetic data
- Seeking a dialogue with:
 - researchers/policy analysts
 - program evaluators
 - program implementers

Conclusions

- Census Bureau is committed to meeting its customers needs by...
 - Advancing the reuse of statistical data through integrated administrative record and survey/census data sets
 - Reducing the cost and respondent burden of developing statistics
 - Ensuring the trust of the public, data providers, and data users
 - Continuing a public dialogue on the advantages and cautions surrounding administrative records uses

Contact Information

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